

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF
UNITED PARCEL SERVICE REDIRECTED FROM WITNESS BRADLEY (USPS-T-14)
(UPS/USPS-T14-44(b))

The United States Postal Service hereby provides a response to the following
interrogatory of United Parcel Service: UPS/USPS-T14-44(b), filed on September 11,
1997.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

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September 25, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY
OF UNITED PARCEL SERVICE
(Redirected from Witness Bradley, USPS-T-14)

UPS/USPS-T14-44(b). Please provide: (1) mail processing overtime wages paid, (2) total mail volume, and (3) volume by shape and/or class of mail, by accounting period for FY 1988-1996 (accounting periods 1 through 13).

UPS/USPS-44(b) Response:

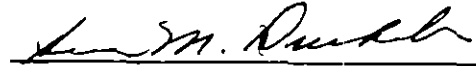
For information available on total mail volume and volumes by class of mail by accounting period for the requested time period, please see the Financial & Operating Statements filed with the Postal Rate Commission pursuant to the Commission's periodic reporting requirements. Please note that these Statements were not published for APs 1 through 6 of FY 1993. Also, quarterly information on total mail volume and volume by class of mail is available in the Revenue, Pieces and Weight report filed with the Postal Rate Commission pursuant to the Commission's periodic reporting requirements. Please note that the Financial & Operating Statements contain some information on mail processing overtime. Currently, the Statement shows total mail processing workhours and an overtime ratio per 100 workhours for total workhours. Attachment 1 contains available information on overtime wages for the mail processing function from FY 1988 through FY 1996 by AP.

Mail Processing (\$000)									
Overtime wages for the Mail Processing Function by AP									
	1988	1989	1990	1991	1992	1993	1994	1995	1996
A/P 1	48,465	41,717	46,350	69,981	61,520	57,564	93,837	81,198	71,960
A/P 2	41,513	36,075	43,252	65,887	61,776	.	94,810	87,562	74,818
A/P 3	66,847	55,423	46,890	87,079	73,499	.	97,961	87,632	79,473
A/P 4	52,805	61,463	80,215	101,893	104,381	.	132,768	131,049	127,009
A/P 5	47,849	43,616	53,008	74,190	62,404	.	84,667	75,134	76,124
A/P 6	34,771	38,100	44,952	60,019	58,202	87,996	82,026	63,687	72,190
A/P 7	32,941	32,166	40,828	46,094	50,505	82,711	77,719	55,569	65,377
A/P 8	24,124	25,708	40,428	41,927	56,500	88,910	76,304	58,196	71,627
A/P 9	17,265	21,436	31,782	36,054	44,438	73,424	64,200	44,590	56,955
A/P 10	15,279	19,394	27,229	31,401	36,455	66,167	55,201	40,440	52,376
A/P 11	25,739	28,734	38,607	40,477	50,442	75,418	60,685	46,436	62,278
A/P 12	24,755	28,663	38,439	38,950	51,894	.	60,744	45,047	61,694
A/P 13	35,675	41,118	54,467	52,911	65,706	.	68,258	55,543	81,209

Source: NWRS National Consolidated current period information by Accounting Period for Mail Processing Overtime Wages. There is some information not available - identified by "

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in cursive script, appearing to read "Susan M. Duchek", is written over a horizontal line.

Susan M. Duchek

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